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Counsel to the Ad Hoc Group of Genesis Lenders

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

Genesis Global Holdco, LLC, *et al.*,

Debtors.¹

Chapter 11

Case No. 23-10063 (SHL)

Jointly Administered

**DECLARATION OF PETER D. DOYLE
IN SUPPORT OF THE AD HOC GROUP OF GENESIS LENDERS' MEMORANDUM
CONCERNING DEBTORS' IMPROPERLY WITHHELD DOCUMENTS**

I, Peter D. Doyle, hereby declare under penalty of perjury, pursuant to section 1746 of title 28 of the United States Code, as follows:

1. I am a licensed attorney at law and am a Partner with the firm of Proskauer Rose LLP, counsel of record for the Ad Hoc Group² in the above-captioned action, currently pending

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's tax identification number (as applicable) are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (9564); and Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 250 Park Avenue South, 5th Floor, New York, NY 10003.

² Capitalized terms used but not defined herein shall have the meaning ascribed to them in the Motion.

before this Court. I submit this declaration (the “Declaration”) in support of the *Ad Hoc Group Of Genesis Lenders’ Memorandum Concerning Debtors’ Improperly Withheld Documents* (the “Motion”), filed concurrently with this Declaration.

2. On September 15, 2023, at 11:00 a.m., the Honorable Sean H. Lane conducted a conference with counsel for the Ad Hoc Group, the Debtors, and the UCC, to resolve the discovery issues set forth in the concurrently filed Motion. Judge Lane permitted the parties to file the Motion with authorities, and requested that the parties provide the Privilege Log at issue. A true and correct copy of the Privilege Log is attached hereto as Exhibit 1.

Dated: September 15, 2023

New York, New York

/s/ Peter D. Doyle

Peter D. Doyle

Exhibit 1

Log No.	Sort Date/Time	Record Type	Email From/Author	Email To	Email CC	Privilege Description	Privilege Type
1	7/2/2023 11:39	Email	Abelson, Philip [philip.abelson@whitecase.com]	VanLare, Jane [jvanlare@cgsh.com]		Communications related to FTX settlement discussions	Work Product (Common Interest)
2	7/2/2023 16:58	Email	VanLare, Jane [jvanlare@cgsh.com]	philip.abelson@whitecase.com		Communications related to FTX settlement discussions	Work Product (Common Interest)
3	7/6/2023 11:58	Email	Shore, Christopher [cshore@whitecase.com]	VanLare, Jane [jvanlare@cgsh.com]; philip.abelson@whitecase.com; Barefoot, Luke A [lbarefoot@cgsh.com]	West, Colin [cwest@whitecase.com]	Communications related to FTX settlement discussions	Work Product (Common Interest)
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6	7/12/2023 2:02	Email	O'Neal, Sean A [soneal@cgsh.com]	philip.abelson@whitecase.com	VanLare, Jane [jvanlare@cgsh.com]; Shore, Christopher [cshore@whitecase.com]; West, Colin [cwest@whitecase.com]; Parra Criste, Amanda [aparracriste@whitecase.com]	Communications related to FTX settlement discussions	Work Product (Common Interest)
7	7/12/2023 2:10	Email	Abelson, Philip [philip.abelson@whitecase.com]	O'Neal, Sean A [soneal@cgsh.com]	VanLare, Jane [jvanlare@cgsh.com]; Shore, Christopher [cshore@whitecase.com]; West, Colin [cwest@whitecase.com]; Parra Criste, Amanda [aparracriste@whitecase.com]	Communications related to FTX settlement discussions	Work Product (Common Interest)
8	7/12/2023 2:13	Email	O'Neal, Sean A [soneal@cgsh.com]	philip.abelson@whitecase.com	VanLare, Jane [jvanlare@cgsh.com]; Shore, Christopher [cshore@whitecase.com]; West, Colin [cwest@whitecase.com]; Parra Criste, Amanda [aparracriste@whitecase.com]	Communications related to FTX settlement discussions	Work Product (Common Interest)
9	7/12/2023 2:17	Email	Abelson, Philip [philip.abelson@whitecase.com]	O'Neal, Sean A [soneal@cgsh.com]	VanLare, Jane [jvanlare@cgsh.com]; Shore, Christopher [cshore@whitecase.com]; West, Colin [cwest@whitecase.com]; Parra Criste, Amanda [aparracriste@whitecase.com]	Communications related to FTX settlement discussions	Work Product (Common Interest)
10	7/12/2023 10:30	Email	Shore, Christopher [cshore@whitecase.com]	philip.abelson@whitecase.com; O'Neal, Sean A [soneal@cgsh.com]	VanLare, Jane [jvanlare@cgsh.com]; West, Colin [cwest@whitecase.com]; Parra Criste, Amanda [aparracriste@whitecase.com]	Communications related to FTX settlement discussions	Work Product (Common Interest)
11	7/12/2023 10:30	Attachment				Non-Responsive embedded attachment	
12	7/12/2023 14:39	Email	Abelson, Philip [philip.abelson@whitecase.com]	Shore, Christopher [cshore@whitecase.com]; O'Neal, Sean A [soneal@cgsh.com]	VanLare, Jane [jvanlare@cgsh.com]; West, Colin [cwest@whitecase.com]; Parra Criste, Amanda [aparracriste@whitecase.com]	Communications related to FTX settlement discussions	Work Product (Common Interest)
13	7/14/2023 22:36	Email	VanLare, Jane [jvanlare@cgsh.com]	philip.abelson@whitecase.com		Communications related to FTX settlement discussions	Work Product (Common Interest)
14	7/15/2023 12:38	Email	Abelson, Philip [philip.abelson@whitecase.com]	VanLare, Jane [jvanlare@cgsh.com]; O'Neal, Sean A [soneal@cgsh.com]		Communications related to FTX settlement discussions	Work Product (Common Interest)
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17	7/15/2023 15:25	Email	Abelson, Philip [philip.abelson@whitecase.com]	VanLare, Jane [jvanlare@cgsh.com]; O'Neal, Sean A [soneal@cgsh.com]		Communications related to FTX settlement discussions	Work Product (Common Interest)
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21	7/15/2023 22:06	Email	VanLare, Jane [jvanlare@cgsh.com]	O'Neal, Sean A [soneal@cgsh.com]	philip abelson@whitecase.com	Communications related to FTX settlement discussions	Work Product (Common Interest)
22	7/18/2023 14:00	Email	VanLare, Jane [/O=CGSH/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENT/TS/CN=JANE VANLAREB4A]	philip abelson@whitecase.com	O'Neal, Sean A [soneal@cgsh.com]	Communications related to FTX settlement discussions	Work Product (Common Interest)
23	7/20/2023 19:20	Email	VanLare, Jane [/O=CGSH/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENT/TS/CN=JANE VANLAREB4A]	philip abelson@whitecase.com; Shore, Christopher [cshore@whitecase.com]	O'Neal, Sean A [soneal@cgsh.com]; Barefoot, Luke A [lbarefoot@cgsh.com]	Communications related to FTX settlement discussions	Work Product (Common Interest)
24	7/20/2023 19:31	Email	Abelson, Philip [philip.abelson@whitecase.com]	VanLare, Jane [jvanlare@cgsh.com]; Shore, Christopher [cshore@whitecase.com]	O'Neal, Sean A [soneal@cgsh.com]; Barefoot, Luke A [lbarefoot@cgsh.com]	Communications related to FTX settlement discussions	Work Product (Common Interest)
25	7/20/2023 19:39	Email	O'Neal, Sean A [soneal@cgsh.com]	philip abelson@whitecase.com	VanLare, Jane [jvanlare@cgsh.com]; Shore, Christopher [cshore@whitecase.com]; Barefoot, Luke A [lbarefoot@cgsh.com]	Communications related to FTX settlement discussions	Work Product (Common Interest)
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27	7/20/2023 23:32	Email	Shore, Christopher [cshore@whitecase.com]	VanLare, Jane [jvanlare@cgsh.com]		Communications related to FTX settlement discussions	Work Product (Common Interest)
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30	7/31/2023 14:18	Email	Lenox, Brad [blenox@cgsh.com]	West, Colin [cwest@whitecase.com]; Meises, Michele [michele.meises@whitecase.com]; philip abelson@whitecase.com; Shore, Christopher [cshore@whitecase.com]; Parra Criste, Amanda [aparracriste@whitecase.com]	O'Neal, Sean A [soneal@cgsh.com]; Barefoot, Luke A [lbarefoot@cgsh.com]; VanLare, Jane [jvanlare@cgsh.com]; Weaver, Andrew [aweaver@cgsh.com]; Team-Genesis-Associates-CGSHOnly [Team-Genesis-Associates-CGSHOnly@cgsh.com]	Communications related to FTX settlement discussions	Work Product (Common Interest)
31	7/31/2023 14:18	Attachment	Cleary Gottlieb Steen & Hamilton LLP			Communications related to FTX settlement discussions	Work Product (Common Interest)
32	7/31/2023 14:37	Email	Meises, Michele [michele.meises@whitecase.com]	Lenox, Brad [blenox@cgsh.com]; West, Colin [cwest@whitecase.com]; philip abelson@whitecase.com; Shore, Christopher [cshore@whitecase.com]; Parra Criste, Amanda [aparracriste@whitecase.com]	O'Neal, Sean A [soneal@cgsh.com]; Barefoot, Luke A [lbarefoot@cgsh.com]; VanLare, Jane [jvanlare@cgsh.com]; Weaver, Andrew [aweaver@cgsh.com]; Team-Genesis-Associates-CGSHOnly [Team-Genesis-Associates-CGSHOnly@cgsh.com]	Communications related to FTX settlement discussions	Work Product (Common Interest)

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34	8/7/2023 15:12	Email	Parra Criste, Amanda [aparracriste@whitecase.com]	O'Neal, Sean A [soneal@cgsh.com]; VanLare, Jane [jvanlare@cgsh.com]	philip abelson@whitecase.com; Meises, Michele [michele.meises@whitecase.com]; Strom, Peter [peter.strom@whitecase.com]	Communications related to FTX settlement discussions	Work Product (Common Interest)
35	8/8/2023 2:56	Email	VanLare, Jane [O=CGSH/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENT/TS/CN=JANE VANLAREB4A]	Parra Criste, Amanda [aparracriste@whitecase.com]; O'Neal, Sean A [soneal@cgsh.com]	philip abelson@whitecase.com; Meises, Michele [michele.meises@whitecase.com]; Strom, Peter [peter.strom@whitecase.com]; Maisel, Nicholas [nmaisel@cgsh.com]; Hatch, Miranda [mhatch@cgsh.com]	Communications related to FTX settlement discussions	Work Product (Common Interest)
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37	8/8/2023 3:24	Email	Lenox, Brad [blenox@cgsh.com]	Parra Criste, Amanda [aparracriste@whitecase.com]; West, Colin [cwest@whitecase.com]; Meises, Michele [michele.meises@whitecase.com]; philip abelson@whitecase.com; Shore, Christopher [cshore@whitecase.com]	O'Neal, Sean A [soneal@cgsh.com]; Barefoot, Luke A [lbarefoot@cgsh.com]; VanLare, Jane [jvanlare@cgsh.com]; Weaver, Andrew [aweaver@cgsh.com]; Massey, Jack [jamassey@cgsh.com]	Communications related to FTX settlement discussions	Work Product (Common Interest)
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46	8/11/2023 17:52	Email	Lenox, Brad [blenox@cgsh.com]	Parra Criste, Amanda [aparracriste@whitecase.com];West, Colin [cwest@whitecase.com];Meises, Michele [michele meises@whitecase.com];philip abelson@whitecase.com;Shore, Christopher [cshore@whitecase.com]	O'Neal, Sean A [soneal@cgsh.com];Barefoot, Luke A [lbarefoot@cgsh.com];VanLare, Jane [jvanlare@cgsh.com];Weaver, Andrew [aweaver@cgsh.com];Massey, Jack [jamassey@cgsh.com]	Communications related to FTX settlement discussions	Work Product (Common Interest)
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54	8/31/2023 14:32	Email	VanLare, Jane [jvanlare@cgsh.com]	philip abelson@whitecase.com;Michele Meises [michele meises@whitecase.com];Amanda Parra Criste [aparracriste@whitecase.com]	O'Neal, Sean A [soneal@cgsh.com];Barefoot, Luke A [lbarefoot@cgsh.com]	Communications related to FTX settlement discussions	Work Product (Common Interest)
55	8/31/2023 14:36	Email	Abelson, Philip [philip abelson@whitecase.com]	VanLare, Jane [jvanlare@cgsh.com];Meises, Michele [michele meises@whitecase.com];Parra Criste, Amanda [aparracriste@whitecase.com]	O'Neal, Sean A [soneal@cgsh.com];Barefoot, Luke A [lbarefoot@cgsh.com]	Communications related to FTX settlement discussions	Work Product (Common Interest)
56	8/31/2023 14:37	Email	O'Neal, Sean A [soneal@cgsh.com]	philip abelson@whitecase.com	VanLare, Jane [jvanlare@cgsh.com];Meises, Michele [michele meises@whitecase.com];Parra Criste, Amanda [aparracriste@whitecase.com];Barefoot, Luke A [lbarefoot@cgsh.com]	Communications related to FTX settlement discussions	Work Product (Common Interest)
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59	8/31/2023 22:13	Email	Abelson, Philip [philip abelson@whitecase.com]	O'Neal, Sean A [soneal@cgsh.com]	VanLare, Jane [jvanlare@cgsh.com]	Communications related to FTX settlement discussions	Work Product (Common Interest)
60	9/1/2023 16:47	Email	VanLare, Jane [/O=CGSH/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENT/CN=JANE VANLAREB4A]	Abelson, Philip [philip abelson@whitecase.com];Parra Criste, Amanda [aparracriste@whitecase.com];Meises, Michele [michele meises@whitecase.com];O'Neal, Sean A [soneal@cgsh.com]	Ribeiro, Christian [cribeiro@cgsh.com];Massey, Jack [jamassey@cgsh.com]	Communications related to FTX settlement discussions	Work Product (Common Interest)
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67	9/1/2023 20:55	Email	Strom, Peter [peter.strom@whitecase.com]	philip abelson@whitecase.com;Massey, Jack [jamassey@cgsh.com];Meises, Michele [michele meises@whitecase.com];Parra Criste, Amanda [aparracriste@whitecase.com]	VanLare, Jane [jvanlare@cgsh.com]	Communications related to FTX settlement discussions	Work Product (Common Interest)
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71	9/2/2023 4:01	Email	Meises, Michele [michele.meises@whitecase.com]	VanLare, Jane [jvanlare@cgsh.com];philip abelson@wh itecase.com;Parra Criste, Amanda [aparracriste@whitecase.com];O'Neal, Sean A [soneal@cgsh.com]	Ribeiro, Christian [criste@cgsh.com];Massey, Jack [jamassey@cgsh.com]	Communications related to FTX settlement discussions	Work Product (Common Interest)
72	9/4/2023 22:00	Email	Massey, Jack [jamassey@cgsh.com]	Strom, Peter [peter.strom@whitecase.com];philip abel son@whitecase.com;Meises, Michele [michele.meises@whitecase.com];Parra Criste, Amanda [aparracriste@whitecase.com]	VanLare, Jane [jvanlare@cgsh.com]	Communications related to FTX settlement discussions	Work Product (Common Interest)
73	9/4/2023 22:08	Email	Abelson, Philip [philip.abelson@whitecase.com]	Massey, Jack [jamassey@cgsh.com];Strom, Peter [peter.strom@whitecase.com];Meises, Michele [michele.meises@whitecase.com];Parra Criste, Amanda [aparracriste@whitecase.com]	VanLare, Jane [jvanlare@cgsh.com]	Communications related to FTX settlement discussions	Work Product (Common Interest)
74	9/4/2023 22:22	Email	Strom, Peter [peter.strom@whitecase.com]	philip abelson@whitecase.com;Massey, Jack [jamassey@cgsh.com];Meises, Michele [michele.meises@whitecase.com];Parra Criste, Amanda [aparracriste@whitecase.com]	VanLare, Jane [jvanlare@cgsh.com]	Communications related to FTX settlement discussions	Work Product (Common Interest)
75	9/4/2023 22:22	Attachment	White & Case LLP			Communications related to FTX settlement discussions	Work Product (Common Interest)
76	9/5/2023 0:25	Email	Massey, Jack [jamassey@cgsh.com]	Strom, Peter [peter.strom@whitecase.com];philip abel son@whitecase.com;Meises, Michele [michele.meises@whitecase.com];Parra Criste, Amanda [aparracriste@whitecase.com]	VanLare, Jane [jvanlare@cgsh.com]	Communications related to FTX settlement discussions	Work Product (Common Interest)
77	9/5/2023 1:36	Email	Abelson, Philip [philip.abelson@whitecase.com]	Massey, Jack [jamassey@cgsh.com];Strom, Peter [peter.strom@whitecase.com];Meises, Michele [michele.meises@whitecase.com];Parra Criste, Amanda [aparracriste@whitecase.com]	VanLare, Jane [jvanlare@cgsh.com]	Communications related to FTX settlement discussions	Work Product (Common Interest)